

**EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ALEXANDER THOMPSON,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:13-CV-00367-LPL
vs.	)	
	)	
NATIONAL FOOTBALL LEAGUE;	)	(Filed Electronically)
NFL FILMS, INC.; and NFL	)	
PRODUCTIONS, LLC,	)	
	)	
Defendants.	)	

**DEFENDANTS' REPLY MEMORANDUM  
IN SUPPORT OF THEIR MOTION TO TRANSFER  
PURSUANT TO 28 U.S.C. § 1404(a)**

**REPLY**

This case raises the same claims and was filed by the same plaintiffs' counsel who also filed the *Tatum v. National Football League* case pending before this Court. In its reply brief filed today in *Tatum*, see Dkt. 18 Ex. A, *Tatum*, No. 2:13-CV-01814-LPL (W.D. Pa. Mar. 5, 2014), the NFL explains why that case and all of the opt-out litigation against the NFL should be transferred to the District of Minnesota, which managed the *Dryer* class case out of which all the opt-out litigation arose, and where the first-filed opt-out case is currently proceeding in litigation. Plaintiff does not dispute that his claims arose from *Dryer* and mirror those brought in *Tatum*. Nor does he contend that there is any reason to retain this case if *Tatum* is transferred. Indeed, Plaintiff's brief opposing transfer simply repeats verbatim most of the arguments made by the same counsel in their opposition brief in *Tatum*. Compare Pls.' Br. in Opp. to Transfer, Dkt. 19, with Pls.' Br. in Opp. to Transfer, *Tatum*, Dkt. 16 (Feb. 18, 2014). The arguments are unpersuasive here for the same reasons they are unpersuasive in *Tatum*. Accordingly, for the same reasons given by the NFL in its reply brief in *Tatum*, and to keep together these obvious companion cases, the NFL's motion to transfer should be granted.

Respectfully submitted,

Dated: March 5, 2014

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